

EXHIBIT 20.1

1 THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2
3 In the Matter of:)
4) File No. HO-14036-A
5 DEEPROOT 575 FUND, LLC)
6

7 WITNESS: Robert Mueller

8 PAGES: 1 through 287

9 PLACE: Securities and Exchange Commission
10 100 F Street NE
11 Washington, D.C.

12 DATE: Wednesday, June 23, 2021
13

14 The above-entitled matter came on for hearing,
15 via WebEx, pursuant to notice, at 9:08 a.m.
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24 Diversified Reporting Services, Inc.

25 (202) 467-9200

1 Q You've written and distributed private
2 placement memoranda. Correct?

3 A We have distributed it to investors prior
4 to subscription. Correct.

5 Q So when you distribute them you have some
6 sort of mechanism for keeping control of who's gotten
7 the PPM. Correct?

8 A That answer is quite complicated but there
9 was a time where we put an identifier on there that
10 would match a PPM with an application and subscription
11 agreement.

12 Q That's exactly the question I was asking a
13 few minutes ago. Now, where do you keep a log of the
14 numbers you put on PPMs when you sent them out?

15 MR. PRITIKIN: Objection. That's assuming
16 there is a log but go ahead.

17 A There -- there are some pages that Becca,
18 who is the clerk that takes care of that. I do not know
19 if she keeps those logs. I haven't seen those logs
20 since we stopped taking them. So I'm not aware that
21 those logs even exist.

22 Q But you haven't produced any old logs from
23 when you used this system. Correct?

24 A My struggle with answering this is my
25 understanding of the subpoenas that were originally done

1 would have been organized. And some of them were
2 delisted or dormant for a while. Some were not. Some
3 are dormant now whereas they were not before.

4 Q You've alluded to this. But you've
5 formerly run some other investment funds. Correct?

6 A It's a very broad question. I cannot
7 answer it.

8 Q I'm happy to specify. You mentioned the
9 Deeproot Short-Term Fixed Rate Debenture Fund LLC.
10 Correct?

11 A Correct.

12 Q There was also the Deeproot 3-Year Bonus
13 Income Debenture Fund LLC.

14 A Yes.

15 Q And there was the Deeproot 3-Year Bonus
16 Reset Debentures Fund LLC.

17 A Yes.

18 Q And the Deeproot Bonus Growth 5-Year
19 Debenture Fund LLC.

20 A Yes.

21 Q Are there any other investment funds that
22 you've run besides those and the current funds?

23 A There -- I mean, I'm going to refer back to
24 the corporate org charts that I provided for relevant
25 lists in those time periods.

1 Q What I'm asking, so the org chart that was
2 Exhibit 5 began at 2016. And what I'm getting at is
3 that I believe these four funds I've named pre-dated --
4 largely pre-dated 2016. Is that correct?

5 A I do not remember. They were organized
6 before then, but I don't remember exactly when a lot of
7 those placements happened and whether they happened
8 prior to 2016.

9 Q These four funds, STFR, Short-Term Fixed
10 Rate Debenture Fund, 3-Year Bonus, 3-Year Bonus Reset
11 and the Bonus Growth 5-Year. These four funds, are they
12 still active?

13 A No. None of them are taking new
14 subscriptions.

15 Q Are they all wound up?

16 A I don't know what wound up means.

17 Q Well, have all the funds' investors been
18 paid back and the funds are now closed?

19 A On some, but not others.

20 Q Which ones are still open?

21 A The Bonus Growth -- 5-Year Bonus Growth and
22 the 3-Year Bonus Reset. I'm not sure on the Bonus
23 Reset. And I know there was maybe one or two investors
24 left. I don't know if those are in some -- have matured
25 or not. But I know specifically that the 5-Year Bonus

1 Growth does have existing investors still.

2 Q And so when you say existing investors,
3 these are investors who are still waiting for repayment
4 of their principal?

5 A Correct.

6 Q Are they still receiving some sort of
7 investment return?

8 A For both of them, it's a deferred return at
9 maturity. So there are no periodic payments.

10 Q Currently, you have the 575 Fund LLC and
11 the Deeproot Growth Runs Deep Fund LLC. Correct?

12 A Correct.

13 Q Are those the only two funds that you're
14 currently operating?

15 A That we are taking subscriptions for. That
16 is correct.

17 Q And in terms of funds that have any
18 activity or any return of principal pending, it's just
19 the 575, the DGRD, and the one or two other funds we
20 just discussed -- older funds we just discussed.
21 Correct?

22 A To the best of my recollection. Yes.

23 Q Can we agree to call the Deeproot Growth
24 Runs Deep Fund the DGRD Fund?

25 A Yes. That's how we normally abbreviate it.

1 reports. I'd have to look at -- from those reports, to
2 determine where we were with at least the policy. A
3 portion of the 575. I'd have to sort of guesstimate
4 where expenses are currently and where they would go,
5 which would take some time and a lot of pulling together
6 with the assets of the 575. And then I would try to
7 determine both percentages are against each other and
8 determine if we were still above 50 percent, close to
9 it, what we needed to do with that.

10 Q How often, each year, do you engage in that
11 exercise?

12 A Usually one to two times. In past years
13 it's been more. When we had a lot more investment in
14 the DGRD versus the 575. Because we wanted to space
15 those, to not prejudice investors in the DGRD. But since
16 -- especially with COVID and the impact it had on our
17 business, and everyone's business last year, to the
18 present, in the last year, year and a half, it has not
19 happened more than about once or twice.

20 Q Do you -- when you undertake this analysis,
21 do you document it?

22 A No. The documentation essentially for me
23 is just to do the transaction to do the purchase,
24 knowing when it would happen.

25 Q Do you personally undertake that evaluation

1 the 575 Fund? And the DGRD Fund?

2 A Yes.

3 Q Who determines the investment strategy of
4 the 575 Fund?

5 A I do.

6 Q Anyone else?

7 A The design strategy would only be me.

8 Q Who chooses the asset classes and the
9 actual assets in which the 575 Fund invests?

10 A I make the final decision.

11 Q You have the ultimate authority over these
12 investment decisions?

13 A That is correct.

14 Q Who purchases the actual assets in which
15 the 575 Fund invests?

16 A I do as officer of the respective company.

17 Q Other than attorneys, who has drafted the
18 language used in the 575 Fund PPM?

19 A Myself.

20 Q Only you?

21 A No. That actually brings me back to --
22 that's why I was looking at the different exhibits you
23 were handing in the dates. Anything after the S-1 had
24 -- S-1 incorporating language, which would have been a
25 combination of attorneys, Centri Business Consulting,

1 Q It was your choice to incorporate any
2 language that any of these other people may have
3 suggested. Correct?

4 A I think it was a very proper choice, in my
5 view, after the amount of time and effort and money that
6 was spent to properly vet some of these provisions. I
7 think it was money well spent to use provisions that
8 have been vetted that well.

9 Q But it was your choice as to what language
10 went into the PPM for the 575 Fund. Correct?

11 A Ultimately, yes. The choice was mine.

12 Q And that was true as to all versions of the
13 575 Fund PPM. Correct?

14 A I would not say that that's -- it was
15 between me and counsel.

16 Q And with respect to -- but other than
17 counsel, you had the final choice as to the language in
18 all versions of the 575 Fund PPM. Correct?

19 A Correct.

20 Q And counsel works for you. Right?

21 A I think that draws a legal conclusion.

22 Q You're the one with the final authority
23 over the content of the 575 Fund PPM. Correct?

24 A Sometimes. Yes.

25 Q On what occasions would you not be the one

1 (SEC Exhibit No. 39 was marked for
2 identification.)

3 A Yes.

4 Q Do you recognize Exhibit 39?

5 A I do.

6 Q And what is Exhibit 39.

7 A It looks like the September 16, 2019 PPM
8 for the Deeproot Growth Runs Deep Fund, or the DGRD.

9 Q And you were the person with ultimate
10 authority over the language that went into the PPM in
11 Exhibit 39. Correct?

12 A Yes.

13 Q And you were the person with ultimate
14 authority over the language in all other DGRD Fund PPMs.
15 Correct?

16 A Yes.

17 Q Who has and exercises the authority to sell
18 an asset of the 575 Fund?

19 A What do you mean by sale?

20 Q Well, if you were to make decisions to
21 dispose of an asset of deeproot Tech or Pinball, if you
22 were to make a decision to sell a policy rather than to
23 hold it, a life insurance policy. Who would be the
24 person with ultimate authority to make those decisions?

25 A With counsel from numerous -- not just

1 Q Well, how is the capital acquisition
2 documented or memorialized?

3 A From which perspective?

4 Q From the perspective of the 575 Fund or the
5 DGRD Fund having its investors' money go to a Deeproot
6 affiliate.

7 A Correct. But if you could help me, is it
8 from an accounting perspective or a legal perspective.

9 Q From the perspective --

10 A Because things are either one of those.

11 Q From the perspective of documenting, what
12 interest, the 575 Fund, the DGRD Fund, gets in return
13 for the money.

14 A So, from a documentation standpoint, the
15 way that I understand the accountants document that, is
16 through the bay [sic] transactions. Up until COVID hit,
17 my understanding was that the intercompany tracked
18 transactions as they came into Deeproot Funds, to the
19 account, then to the Fund, and then to be placed. And
20 since COVID, because it's been so complicated to
21 continue that, is that we've gone to more of a direct
22 route.

23 Q Other than bank records, how is the
24 interest acquired by the 575 Fund or the DGRD Fund
25 memorialized or documented?

1 A I mean, it's financial. I mean, it's going
2 to be in the transactions.

3 BY MR. BAGNALL:

4 Q So, Mr. Mueller, this is George Bagnall
5 again. Can you hear me, sir?

6 A Yes.

7 Q Maybe it would help if we took a step back
8 and you could tell us more about how you operate your
9 businesses in this way. So, after investor money comes
10 into the fund, either the 575 Fund or the DGRD Fund, who
11 makes the decision whether or not to invest some of that
12 money in any of the Deeproot affiliated businesses?

13 A Ultimately, that decision is my decision.
14 And as I've said before, a few moments ago, the way that
15 operated -- we operated for the most part, I don't know
16 when we started that process, but I know that the
17 process was there for a long period of time and it
18 created all kinds of accounting nightmares, trying to
19 trace the intercompanies' transfers. But that money
20 would come directly into the Deeproot Funds, sweep
21 account, bank account. It would then be transferred
22 less the finder fee or advisory fee or commission to the
23 actual fund bank account. And then from the fund bank
24 account, it would be transferred and placed directly
25 with Policy Services or with deeproot Tech, Deeproot

1 another purpose, and I just can't recall.

2 Q Do you have any other recollection of what
3 the purpose of this agreement at Exhibit 66 would've
4 been?

5 A No. Unless you'd like to enlighten me on
6 where you received it. That would very much help
7 without me having to go back and try to look back
8 through the documents and records and notes.

9 Q You mentioned before the break that there
10 was an agreement between the funds and the
11 Deeproot-related entities. We discussed that before the
12 break. Is Exhibit 66 that agreement?

13 A No, it is not.

14 Q It's not? Okay. I think we'll move on.

15 BY MR. BAGNALL:

16 Q So, Mr. Mueller, do you see there at the
17 first page of -- sorry. This is George Bagnall. Do you
18 see at the top of Exhibit 66 in the opening paragraph,
19 it references in the second to last line both the 575
20 Fund and the DGRD Fund? Do you see that?

21 A Yes. That's what I mentioned before. I
22 saw that immediately.

23 Q And so this agreement that -- I'm sorry if
24 I'm making you repeat yourself. I was just a little
25 confused maybe by the answer. So this doesn't govern

1 any of the relationship, the financial relationship
2 between the funds the related businesses?

3 A I do not know why this was created. I
4 would have to review it and go back for notes and try to
5 figure out. I don't know if it was trying to close a
6 hole in something else or if it was presented to an
7 investor or a financial advisor for another purpose. I
8 just can't remember.

9 Q So the agreement that we were talking about
10 before the break, was it created before or after the
11 date, November 20, 2020?

12 A Could you give me a second, sir? I'm
13 flipping through this --

14 Q Sure.

15 A -- here.

16 Q Yeah. And just as you're flipping through,
17 you'll notice in the bottom right-hand corner, there's
18 some Bates stamps there. Maybe there's not. I thought
19 there were.

20 A I'm not -- I just want to make sure as I'm
21 flipping through here. I'm not contesting the
22 legitimacy of the document. I just -- believe me. As
23 you all said, there are a lot of documents. Maybe not
24 as many as you wanted and maybe not as soon as you
25 wanted, but there are a lot of documents that I had to

1 you want and then I'll read that section then. I think
2 that would be easier in this case since like --

3 Q Okay. Do you recognize Exhibit 73?

4 A Must have been an e-mail that we must have
5 received. I don't remember the e-mail in question.

6 Q Do you recognize the letter that's attached
7 to it?

8 A Letter, I believe was the letter we sent
9 out to all 575 P investors. This is the letter I
10 referred to before, so. Oh wait. Let me read this. I
11 apologize, 'cause there was an August letter that we
12 sent out.

13 Yea, I'm sorry. This is not that letter.
14 This was the letter we sent out in August -- the time
15 that 575 P would be paid because it was getting out of
16 control.

17 Q Okay. You drafted this letter. Correct?

18 A Yes.

19 Q And this letter was transmitted to 575 Fund
20 investors. Right?

21 A Correct.

22 Q How was it transmitted to those investors?

23 A We sent the letter through a third party
24 mailing service that mailed hard copies to all
25 investors.

1 THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2
3 In the Matter of:)

4) File No. HO-14036-A

5 DEEPROOT 575 FUND, LLC)

6
7 WITNESS: Robert Mueller

8 PAGES: 288 through 387

9 PLACE: Securities and Exchange Commission

10 100 F Street NE

11 Washington, D.C.

12 DATE: Thursday, June 24, 2021

13
14 The above-entitled matter came on for hearing,
15 via WebEx, pursuant to notice, at 9:03 a.m.

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24 Diversified Reporting Services, Inc.

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1 wait until the end as well.

2 MR. PRITIKIN: Nothing at this point.

3 Q Okay. Thank you. I have a few clean-up
4 questions, Mr. Mueller. Have you ever tried to become
5 an associated person of a broker dealer?

6 A Depends what you mean by try. I took some
7 -- as I disclosed, I took some education to sit for
8 Series 7 but it never went any further than that.

9 Q Did you take any other steps relating to
10 trying to become an associated person of a broker
11 dealer?

12 A Not that I recall.

13 Q And when was that that you did the training
14 for the Series 7?

15 MR. PRITIKIN: Objection. That
16 mischaracterizes his testimony.

17 Q Correct me if I'm wrong, Mr. Mueller, but I
18 believe you did some education, some Series 7 prep and
19 when did you do that?

20 A I don't recall. It was -- if I had to
21 narrow it down to a timeline it was before the 575 and
22 the DGRD were put into place.

23 Q What is the Food Development Corporation of
24 Texas?

25 A FDC, as I call it. It is a company that

1 works with either NGOs, governments, or other
2 corporations typically in North Africa and we invested
3 equity prior to Deeproot. I invested my own equity and
4 then through Policy Service in the early days before
5 Deeproot really got going, we added some additional
6 money and then we purchased some additional equity
7 shares. I believe probably about two years ago.

8 Q What have you received from that
9 investment? What has the Deeproot family of companies
10 received from that investment in Food Development
11 Corporation of Texas?

12 A So we have not received any distributions.
13 We have not received any dividends from that, from that
14 equity.

15 Q Now, you mentioned -- I think you mentioned
16 that the investment happened before Deeproot got going
17 and then in recent years, for the sake brevity, Policy
18 Services Inc. has sent \$385,000 between July 2016 and
19 April 2020 to FDC of Texas. I'm wondering have you
20 received any sort of stock certificates or other
21 certificated investments in FDC?

22 A There are other share certificates. There
23 were agreements which confirmed those shares.

24 Q What percentage of FDC does the Deeproot
25 family of companies own?

1 A I don't recall the specific number but it
2 is just less than 50 percent from my best recollection.

3 Q Have you ever provided any legal advice to
4 FDC?

5 A I don't know if I've provided legal advice
6 to FDC as most of their dealings are with international
7 law which I'm not versed in. I can't recall though. It
8 might have happened that a question was asked or I was
9 asked to look over a document or something but I can't
10 recall specifics.

11 Q Who owns the other 49 or 50 or 51 percent,
12 the remainder of the equity of FDC?

13 A A gentleman named Frank Kartchner as far I
14 know.

15 Q Thank you. In addition to the loan we
16 discussed yesterday you've obtained other loans for the
17 Deeproot family of companies. Correct?

18 A Yes. I did notice after in clarifying
19 yesterday's questions about that, I did recall after
20 getting back to my hotel room and doing some work that
21 there is a line of credit through Wells Fargo for Policy
22 Services.

23 Q How much is that line of credit?

24 A It's in the 30 -- \$30,000 range. I don't
25 remember the exact amount.

1 A I do.

2 Q What is Exhibit 85?

3 A It was a distribution for the purchase of a
4 condo in Kauai.

5 Q Can you spell Kauai for the record?

6 A K-A-U-A-I.

7 Q And that's in Hawaii, obviously. Right?

8 A It's a county in Hawaii that I'm aware of.
9 Yes.

10 Q On or about November 15, 2016 you wired
11 \$135,000 from the bank account of Policy Services, Inc.
12 to Old Republic Title and Escrow in Hawaii. Correct?

13 A That is correct.

14 Q What was the purpose -- you described this
15 a little bit. But can you tell us what the purpose of
16 this expenditure was, more fully?

17 A The purpose was to go toward the purchase
18 price of a condo in Kauai.

19 Q This was approximately half of the purchase
20 price and closing costs for that condo. Correct?

21 A I don't recall.

22 Q That condominium was titled in the name the
23 MB, as in Mike Bravo, the MB Hale Ohana Trust. Correct?

24 A That sounds correct. Yes.

25 Q And for the record, Poly Ohana is two

1 words, H-A-L-E O-H-A-N-A. Mr. Mueller, you, your father,
2 and your stepmother have been the three trustees of the
3 MB Hale Ohana Trust. Correct?

4 A I don't remember exactly who the trustees
5 are. We're all grantors of the trust.

6 Q And you're a beneficiary of this trust.
7 Correct?

8 A We would all be as grantors. Yes.

9 Q You used \$135,000 of investor funds towards
10 the purchase of a condominium in Hawaii. Correct?

11 A I would not characterize it like that. I
12 do not believe that's a correct statement.

13 Q This was a personal expense. Correct?

14 A I would not consider it a personal or a
15 business expense.

16 Q If it's not a personal or a business
17 expense, then what is it?

18 A It's a distribution.

19 Q What documentation exists for this
20 distribution? Other than payment records. Other than
21 bank records or QuickBooks records and the like.

22 A So, it was accounted for that year by
23 Charlotte, Ms. Acker as a distribution. And it was
24 discussed with the accountants. As I recall, anything
25 else beyond that, I do not recall.

1 Q And Mr. Van Winkle, an officer of Americus
2 Diamond, and the reason why I mention his name is
3 because the charge has variously shown as being to him
4 or to Americus Diamond. So let me ask a fresh question.
5 On or about December 15th, 2018 you paid Americus
6 Diamond \$6,247.11 for jewellery. Correct?

7 MR. PRITIKIN: Objection.

8 A I appears so, yes.

9 Q And again, you used the American Express
10 card of National Wealth Solutions.

11 A I don't recall on that. It says American
12 Express.

13 Q Who was the jewellery for?

14 A The best I can remember, around that time
15 period it was for my current wife, Kristi.

16 Q And you married her approximately two
17 months after this purchase. Correct?

18 A I believe it was more than that, but it was
19 in early 2019 that we got married as talked about on the
20 record.

21 Q And can you scroll to the description of
22 the jewellery you purchased?

23 A Okay.

24 Q And the description says it's a lady's
25 engagement ring. Correct?

1 A Yes. That is in the description. Lady's
2 engagement ring.

3 Q In fact, on January 12th, on or about
4 January 12th of 2019 you charged another \$2,802.59 to
5 Americus Diamond. Correct?

6 A I do not verify -- I'm sorry. Do not
7 remember that.

8 Q This over \$9,000 in jewellery reflects
9 personal expenses. Correct?

10 A I don't know.

11 Q These expenses were paid using Deeproot
12 company money. Correct?

13 A I refuse to answer. I invoke my right to
14 protection under -- against self-incrimination under
15 the Fifth Amendment.

16 Q Sir, we are not authorized to compel you to
17 give evidence or testimony as to which you assert your
18 privilege against self-incrimination pursuant to the
19 Fifth Amendment of the United States -- to the United
20 States Constitution and we have no intention of doing
21 so. We also do not have the authority to compel your
22 testimony by granting you immunity from prosecution.
23 Any question that we ask hereafter will be with the
24 understanding that if you wish to assert your privilege
25 against self-incrimination you need merely state that

1 for your second wife. Leah. Correct?

2 A I don't remember.

3 Q Sir, I am now showing what has been marked
4 as Exhibit 92. And Exhibit 92 bears the Bates number
5 SEC-Americus-E0000005 through 8. America -- Exhibit 92
6 is another four page document. It also says Americus
7 Diamond on the top center of the front page. It also
8 has the address 12362 IH 10 West in San Antonio, Texas.

9 (Mueller Exhibit 92 was marked for
10 identification.)

11 Q Sir, do you recognize Exhibit 92?

12 A I'm looking through it.

13 Q Please take your time.

14 A It appears to be again a purchase for
15 jewellery, Americus Diamond, around the time that --
16 that I was engaged to Leah as you mentioned.

17 Q And at the bottom of page 2, it
18 specifically gives the name of Ms. Leah Nelson.
19 Correct? Near the description of the jewellery. I'm
20 sorry. I spoke over you. I apologize.

21 A I do see that.

22 Q You do see where it says Leah Nelson in
23 Exhibit 92?

24 A Yes.

25 Q And on or about the next day, December

1 15th, you charged another \$2,976.88 on the National
2 Wealth Solutions card at Americus Diamond. Correct?

3 MR. PRITIKIN: Objection.

4 A I don't know. That's not shown on this
5 exhibit.

6 Q This exhibit shows that on December 14th,
7 2015, you charged \$5,351.88 using the American Express
8 card of NWS at Americus Diamond. Correct?

9 MR. PRITIKIN: Objection.

10 A It appears to be that amount and it says
11 American Express on it.

12 Q This jewellery was purchased using Deeproot
13 company money. Correct?

14 A I refuse to answer. I invoke the right
15 against self-incrimination under the Fifth Amendment.

16 Q Sir, I'm now showing you what's been marked
17 as Exhibit 93.

18 (Mueller Exhibit 93 was marked for
19 identification.)

20 Q And sir, Exhibit 93 bears the Bates range
21 SEC-RFPA-AMEX-E-0002809 through 29 and it is another
22 American Express duplicate copy account statement of the
23 credit card of National Wealth Solutions ending in
24 4251001. Sir, do you recognize Exhibit 93?

25 A Appears to be a duplicate copy of an Amex

1 A Are you asking me to looking or are you
2 just asking me the question?

3 Q I'm just asking you the question, sir.

4 A I don't know.

5 Q All in all, you spent -- you charged
6 \$7,795.37 in expenses at Wolf Weddings & Events.
7 Correct?

8 MR. PRITIKIN: Objection.

9 A I don't know.

10 Q These expenses were for your wedding to
11 your second wife Leah in -- these expenses were for your
12 wedding to your second wife Leah. Correct?

13 MR. PRITIKIN: Objection.

14 A Would appear to be around that time.

15 Q And you married Ms. Leah Nelson in February
16 of 2016. Correct?

17 A To the best of my memory, yes.

18 Q You paid these expenses for Wolf Weddings &
19 Events with Deeproot company money. Correct?

20 MR. PRITIKIN: Objection.

21 A I refuse to answer. I invoke my right to
22 -- against self-incrimination within the Fifth
23 Amendment.

24 Q Sir, I'm now going to display what has been
25 marked as Exhibit 94. Exhibit 94 bears the Bates range

1 2017 you also charged \$2,507.33 to British Airways.

2 Correct?

3 MR. PRITIKIN: Objection.

4 A I do see that amount listed.

5 Q And this American Express card statement
6 shows that you purchased airline flights to London in
7 the name of you and your child. Correct?

8 MR. PRITIKIN: Objection.

9 A I don't know.

10 Q Sir, did you travel to London on British
11 Airways or a British Airways affiliated carrier with
12 your daughter?

13 A And I've travelled before with my daughter
14 on British Airways. I don't recall this specific trip.

15 Q Sir, between September 2016 and March of
16 2017, in fact, you used the American Express card in the
17 name of National Wealth Solutions to pay over \$13,000 to
18 British Airways. Correct?

19 MR. PRITIKIN: Objection.

20 A I don't know.

21 Q But these were personal travel expenses
22 which were paid for using Deeproot company money.
23 Correct?

24 A I refuse to answer. I invoke my right
25 against self-incrimination under the Fifth Amendment.

1 A I don't know.

2 Q These expenditures to Disney Cruise Lines
3 were personal travel for you and your family. Correct?

4 A I don't know.

5 Q This personal travel was paid for with
6 Deeproot company money. Correct?

7 MR. PRITIKIN: Objection.

8 A I refuse to answer. I invoke my right
9 against self-incrimination under the Fifth Amendment.

10 Q Sir, between March of 2016 and March of
11 2019 you also used the Amex card of National Wealth
12 Solutions to pay over \$15,000 to Princess Cruise Lines.
13 Correct?

14 MR. PRITIKIN: Objection.

15 A I don't know.

16 Q This was personal travel. Correct?

17 A I don't know.

18 Q These charges to Princess Cruise Lines were
19 paid for with Deeproot company money. Correct?

20 MR. PRITIKIN: Objection.

21 A I refuse to answer. I invoke the right --
22 sorry. I invoke my right against self-incrimination
23 under the Fifth Amendment.

24 Q Sir, on or about February 5th, 2018, you
25 charged 7,000 -- over \$7,500 to cruises and more using

1 Q Sir, you used Deeproot company money to pay
2 for your daughter's educational expenses. Correct?

3 MR. PRITIKIN: Objection.

4 A Refuse to answer. I invoke my right
5 against self-incrimination under the Fifth Amendment.

6 Q Sir, you used Deeproot company money to pay
7 for medical expenses. Correct?

8 MR. PRITIKIN: Objection.

9 A I refuse to answer. I invoke my right
10 against self-incrimination under the Fifth Amendment.

11 Q Sir, you used Deeproot company money to pay
12 personal income tax bills. Correct?

13 MR. PRITIKIN: Objection.

14 A I refuse to answer. I invoke my right
15 against self-incrimination under the Fifth Amendment.

16 Q Sir, you used Deeproot company money to pay
17 for the condominium in Hawaii. Correct?

18 MR. PRITIKIN: Objection.

19 A I refuse to answer. I invoke my right
20 against self-incrimination under the Fifth Amendment.

21 Q Sir, you used Deeproot company money to pay
22 for the catering, photography, and wedding planning
23 expenses for your 2019 wedding. Correct?

24 MR. PRITIKIN: Objection.

25 A I refuse to answer. I invoke my right

1 against self-incrimination under the Fifth Amendment.

2 Q Mr. Mueller, before we conclude your
3 testimony do you wish to clarify anything or add
4 anything to the statements you have made over the course
5 of your testimony whether yesterday or today?

6 A Like for a chance to speak with my
7 attorneys before I answer that question.

8 Q Sure. We can go off the record. How long
9 do you need?

10 A A few minutes. Five minutes.

11 MR. BOHR: Five minutes. Okay. Let's go
12 off the record at 12:25.

13 (Whereupon a discussion was held off the
14 record.)

15 MR. BOHR: We're back on the record at
16 12:30.

17 BY MR. BOHR:

18 Q Mr. Mueller, do you understand you're still
19 under oath?

20 A I do.

21 Q And can you confirm that the SEC and you
22 had no substantive discussions while we were off the
23 record?

24 A Yes.

25 Q Thank you, sir. Mr. Mueller, when we went